

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

INTELLECTUAL VENTURES I LLC AND INTELLECTUAL VENTURES II LLC,)	
)	
Plaintiffs,)	Civil Action No. 4:24-cv-980-ALM
)	
v.)	
)	JURY TRIAL
AMERICAN AIRLINES, INC.,)	
)	
Defendant.)	
)	

**UNOPPOSED SECOND MOTION TO EXTEND TIME TO
RESPOND TO THE COMPLAINT**

Defendant American Airlines, Inc. (American) respectfully moves the Court to extend the deadline for American to respond to the Complaint to January 27, 2025. Plaintiffs Intellectual Ventures I LLC and Intellectual Ventures II LLC (collectively, Intellectual Ventures) do not oppose.

Good cause supports the requested extension. FED. R. CIV. P. 6(b)(1)(A). This is a patent-infringement suit with six patents at issue. Dkt.1 at 1. Given that and the ongoing holiday season, counsel for American requires an additional fifteen-day extension (sixty days total, given the first forty-five day extension, 11/20/2024 Minute Order) to prepare American's response. Because that date falls on a Saturday, American requests the Court extend American's deadline to respond to the following Monday, January 27, 2025.

American respectfully requests the Court grant this Unopposed Second Motion to Extend Time to Respond to the Complaint, and enter the proposed order attached as "Exhibit 1."

Dated: December 20, 2024.

McKool Smith, P.C.

/s/ John B. Campbell

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ATTORNEYS FOR Defendant
AMERICAN AIRLINES, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on all counsel of record via the Court's ECF system on December 20, 2024.

/s/ John B. Campbell

John B. Campbell

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for Defendant has complied with the meet and confer requirement in Local Rule CV-7(h) and this motion is unopposed.

/s/ John B. Campbell

John B. Campbell